

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

OSURE BROWN and TOMMY BROWN,  
on his own behalf and on behalf of other  
similarly situated persons,

Plaintiffs,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00669-DGE

Consolidated with

No. 2:20-cv-00680-DGE

STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER  
CONSOLIDATED COMPLAINT  
AND ALTER STRUCTURE OF  
MOTION-TO-DISMISS BRIEFING

NOTE ON MOTION CALENDAR:

MAY 10, 2024

**STIPULATION**

Pursuant to Local Civil Rules 7(d)(1) and 10(g), and for the following reasons, the parties hereby stipulate and agree to extend the time for all Defendants to respond to Plaintiffs' Consolidated Complaint (ECF 162) until and including May 31, 2024.

The Defendants anticipate filing separate motions to dismiss and seek additional time to coordinate in order to avoid needless duplication of arguments. To that end, the Defendants shall be permitted to file a joint brief in support of those motions in order to address arguments common to all Defendants. Such joint brief shall not exceed thirty (30) double-spaced paged. Each individual Defendant shall also each be permitted to file a separate motion-to-dismiss brief

STIPULATION AND ORDER TO EXTEND TIME  
TO ANSWER CONSOLIDATED COMPLAINT  
AND ALTER STRUCTURE OF MOTION-TO-  
DISMISS BRIEFING – 1  
(No. 2:20-cv-00669-DGE)

1 addressing arguments relevant to the individual Defendant. Such individual briefs shall not exceed  
2 sixteen (16) double-spaced pages each. Plaintiffs' opposition to the joint brief shall not exceed  
3 thirty (30) double-spaced pages and their opposition to each individual brief shall not exceed  
4 sixteen (16) double-spaced pages. Defendants' joint reply brief shall not exceed fifteen (15)  
5 double-spaced pages, and any reply in support of each Defendant's individual brief shall not  
6 exceed eight (8) double-spaced pages.

7 Plaintiffs take no position on the extension request and do not agree there is any basis for  
8 dismissal of any claims presented which were previously considered or could have been presented  
9 previously. The Plaintiffs will oppose any further motions to dismiss.

10 Such a stipulated briefing structure will save the Court and the Parties time and effort with  
11 respect to briefing on overlapping or identical issues. This stipulation does not alter or modify any  
12 other rights or responsibilities of the Parties except as stated herein or permitted by law or under  
13 the Federal Rules of Civil Procedure or the Local Civil Rules.

14 DATED: May 10, 2024  
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**ORDER**

IT IS SO ORDERED.

1. Defendants' deadline to respond to the Consolidated Complaint is hereby extended to May 31, 2024.

2. To avoid needless duplication of arguments, the Defendants are hereby permitted to file a joint brief to address motion-to-dismiss arguments common to all Defendants. Such joint brief shall not exceed thirty (30) double-spaced pages. Each individual Defendant shall also be permitted to file a separate motion-to-dismiss brief addressing arguments relevant to the individual Defendant. Any such individual brief shall not exceed sixteen (16) double-spaced pages. Plaintiffs' opposition to the joint brief shall not exceed thirty (30) double-spaced pages and their opposition to each individual brief shall not exceed sixteen (16) double-spaced pages. Defendants' joint reply brief shall not exceed fifteen (15) double-spaced pages, and the reply in support of any Defendant's individual brief shall not exceed eight (8) double-spaced pages.

**\*\*The Parties are cautioned not to abuse this briefing structure and are otherwise directed not to duplicate arguments in the joint and individual motions to dismiss.**

3. This order does not alter or modify any other rights or responsibilities of the Parties except as stated herein or permitted by law or under the Federal Rules of Civil Procedure or the Local Civil Rules.

DATED this 16th day of May, 2024.

  
David G. Estudillo

**UNITED STATES DISTRICT JUDGE**

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TO ANSWER CONSOLIDATED COMPLAINT  
AND ALTER STRUCTURE OF MOTION-TO-  
DISMISS BRIEFING – 5  
(No. 2:20-cv-00669-DGE)